

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

CMFG LIFE INSURANCE COMPANY,
CUMIS INSURANCE SOCIETY, INC., and
MEMBERS LIFE INSURANCE COMPANY,

Plaintiffs,

v.

JPMORGAN SECURITIES, LLC,
BEAR, STEARNS & CO. (n/k/a JPMORGAN
SECURITIES, LLC), WAMU CAPITAL CORP.,
and JPMORGAN CHASE BANK, N.A. (as
successor-in-interest to WAMU CAPITAL CORP.
and WASHINGTON MUTUAL BANK),

Defendants.

Case No. 13-cv-00580

CUNA MUTUAL'S MOTION FOR LEAVE TO AMEND ITS COMPLAINT

Plaintiff CUNA Mutual¹ respectfully moves the Court for leave to amend its Complaint specifically to plead intentional fraud. In support of its motion, CUNA Mutual submits the attached memorandum of law and accompanying exhibits.

WHEREFORE, the Court should grant CUNA Mutual leave to file its Second Amended Complaint alleging claims based on Defendants' intentional fraud.

DATE: July 30, 2014

/s/ Silvija A. Strikis
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Silvija A. Strikis (*pro hac vice*)
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¹ "CUNA Mutual" refers collectively to CMFG Life Insurance Company, CUMIS Insurance Society, Inc., and MEMBERS Life Insurance Company.

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